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**From:** Roe, Lindsay [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=40795436E8044545ADB1FD0CEE48FD02-ROE, LINDSA]  
**Sent:** 2/20/2019 2:22:04 PM  
**To:** McLaughlin, Jessica J [jessicamclaughlin@eastman.com]  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Hi, Jessica.

I just received the pile of studies for your chlormequat chloride registration action yesterday. Unfortunately, though there were some issues in getting those uploaded to our system, so I'm in a holding pattern waiting to make sure that the MRIDs I was given will work. In the future, if at all possible, getting a digital copy of the studies is preferable for us. Studies sent in hard copy are scanned into our system so that they are available to our scientists and any contractors we work with who may be off site.

I have a handwritten list of MRIDs associated with this action at my desk; however, I'm working at home of the next day or two because of the snowstorm here. Once I get back to the office, I can send you that list. Also, I'm hoping that by that time I have gotten some answers to why the MRIDs I was given aren't working, so I'll know that sharing them with you is beneficial.

You can send in a data matrix labeled for the import tolerance petition (not the technical product) that contains all of the generic data available for chlormequat chloride that would be applicable to this action. If you are in a hurry to put in the application and you don't have the MRIDs yet, you can submit a data matrix with blanks that you would then fill in and resubmit once you have the necessary MRIDs.

I'm working at home, but my office phone is forwarding to my cell, so feel free to give me a call if you'd like to discuss.

Thanks,  
Lindsay

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**From:** McLaughlin, Jessica J <jessicamclaughlin@eastman.com>  
**Sent:** Thursday, February 14, 2019 9:43 AM  
**To:** Roe, Lindsay <Roe.Lindsay@epa.gov>  
**Cc:** VanAlstine, Julie <VanAlstine.Julie@epa.gov>  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Hi Lindsay,

I will just cite the MRID number that was assigned to the residue study we submitted in December. However, I do not know the MIRD numbers that have been assigned to our studies. I have not received this communication to date. Is this something someone at EPA can provide to me? Also, you mentioned I will need to submit a data matrix. Do I need to submit a full data matrix and should I include all of the new MIRD numbers that have been assigned to all of the new studies we submitted in December?

Thanks,  
Jessica

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**From:** Roe, Lindsay <Roe.Lindsay@epa.gov>  
**Sent:** Wednesday, February 13, 2019 2:47 PM  
**To:** McLaughlin, Jessica J <jessicamclaughlin@eastman.com>

**Cc:** VanAlstine, Julie <VanAlstine.Julie@epa.gov>  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Hi, Jessica.

No need to submit the data again. Just cite the MRID that was assigned to the study. I'm not sure that I understand the last question in your email. Could you give me a call so I can get some clarification?

Thanks,  
Lindsay

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**From:** McLaughlin, Jessica J <jessicamclaughlin@eastman.com>  
**Sent:** Wednesday, February 13, 2019 2:03 PM  
**To:** Roe, Lindsay <Roe.Lindsay@epa.gov>  
**Cc:** VanAlstine, Julie <VanAlstine.Julie@epa.gov>  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Hello Lindsay,

Thank you for speaking with me today regarding our desire to submit an amendment to the current oat import tolerance with chlormequat chloride. I will be submitting this amendment for oats as a PRIA R292 and will be paying the fee a single time, since we will only be requesting an amendment to a single crop. I have answered your questions below in RED. If you have any follow up questions please let me know.

I do have a follow up question regarding my submission. The data that will be submitted to support the tolerance amendment petition has already been submitted to EPA as part of our Section 3 dossier for chlormequat chloride, do I have to resubmit the report? Can EPA just use the tolerance petition that was submitted in December as part of our Section 3 dossier and I could reference the report in my cover letter?

Thank you for your help.  
Jessica

**Jessica McLaughlin** | Eastman Chemical Company  
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**From:** Roe, Lindsay <Roe.Lindsay@epa.gov>  
**Sent:** Thursday, December 20, 2018 2:38 PM  
**To:** McLaughlin, Jessica J <jessicamclaughlin@eastman.com>  
**Cc:** VanAlstine, Julie <VanAlstine.Julie@epa.gov>  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Hi, Jessica.

As I said in the voicemail I just left on your office line, the action that you submitted for the first domestic food use will be coded as an R150. We will accept an additional action to change the import tolerances as an R292\*3 (meaning the fee would be 3 times the R292 fee).

In order to streamline the process of having two petitions for the same chemical in house as once, I have begun discussions with our Health Effects Division. They have some questions-

1. Are the Canadian and US use patterns identical?
  - a. For wheat, barley, and oats the use patterns will be identical. Barley and oats are not currently on the Canadian label, but a label amendment was submitted in March 2018 to add these uses. The Canadian decision date is June 19, 2019.
2. Is there US-only data coming in with the domestic use package that would not have factored into PMRA's tolerance calculations?
  - a. No, the US data coming in was also submitted to PMRA for their calculations. The submission to PMRA contained European data (already evaluated by EPA), Canadian trials conducted in 2015 (already evaluated by EPA) and new trials conducted in 2016 in Canada and US (part of our tolerance amendment petition and Section 3 application).
3. Could you liaise with PMRA to get us the Canadian DERs for any studies submitted to both EPA and PMRA?
  - a. Yes, we will liaise with PMRA to get their DERs. Since our decision date is June 19, 2019 they may or may not have the evaluation records available.
4. Are tolerances for all commodities being revised? Including the animal tolerances (milk, meat, etc)?
  - a. The tolerances for all animal commodities have not changed.
5. Are the revised import tolerances going to be higher than those currently set in the US? If so is it much higher?
  - a. Yes, they will be higher. The current MRLs in the US for Oats is 10 ppm. To standardize the MRLs we are requesting the tolerances be increased to 30 ppm.
6. Based on Canadian growing seasons for these crops, by what date would you need the tolerances to be revised? We are trying to determine if there is some way for us to "meet in the middle" between the two PIRA dates.
  - a. Ideally, we would like the tolerance for oats to be increased by late 2019/early 2020 so crops can be freely imported into the US from Canada.

Thanks for any insight you can provide.

I will be out of the office from the end of today until January 2<sup>nd</sup>. Hope you have a wonderful holiday season!

Thanks,  
Lindsay

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**From:** McLaughlin, Jessica J <[jessicamclaughlin@eastman.com](mailto:jessicamclaughlin@eastman.com)>  
**Sent:** Thursday, December 13, 2018 9:49 AM  
**To:** Roe, Lindsay <[Roe.Lindsay@epa.gov](mailto:Roe.Lindsay@epa.gov)>  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Thank you for the information, Lindsay. I do not plan to work on the new petition until the first of the year. I will wait for feedback from you before I do too much work on this. I will follow back with you mid-January.

Thanks,  
Jessica

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**From:** Roe, Lindsay <[Roe.Lindsay@epa.gov](mailto:Roe.Lindsay@epa.gov)>  
**Sent:** Wednesday, December 12, 2018 5:02 PM  
**To:** McLaughlin, Jessica J <[jessicamclaughlin@eastman.com](mailto:jessicamclaughlin@eastman.com)>  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Hi, Jessica.

Thanks for the additional information. I'm hoping to be able to present this to the PRIA committee on 12/20, but that assumes that we will have enough managers in the office to hold a meeting. It seems likely that we will not get a

determination on this until early in the new year. I hope I can get back to you with a clear answer before you put any time into developing a petition that may or may not be acceptable.

I'm glad to hear the [REDACTED] has been such a great addition to the family. And I'm glad you're back to work on this chlormequat chloride business with us!

-Lindsay

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**From:** McLaughlin, Jessica J <jessicamclaughlin@eastman.com>  
**Sent:** Wednesday, December 12, 2018 1:15 PM  
**To:** Roe, Lindsay <Roe.Lindsay@epa.gov>  
**Subject:** RE: [I] Chlormequat chloride domestic tolerances coding

Hi Lindsay,

We did submit a Section 3 petition for chlormequat chloride under PRIA code R150 – First Food Use – on 12/7/2018. As part of the petition we submitted additional residue studies for wheat, barley, and oats. I know we will not have feedback on this until late 2020, so our plan is to also submit an amendment to our existing tolerance under PRIA code R292 to try to get the tolerances adjusted for the 2019 growing season. I plan to focus on this submission at the start of the new year. Please let me know your thoughts.

Thank you for the well wishes. I had a [REDACTED] in June. She is our [REDACTED] Ex. 6 Personal Privacy (PP) I've been back to work a few weeks now... the transition always takes me a little time, but I'm so glad our chlormequat chloride submission is out the door.

Thanks,  
Jessica

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**From:** Roe, Lindsay <Roe.Lindsay@epa.gov>  
**Sent:** Wednesday, December 12, 2018 10:30 AM  
**To:** McLaughlin, Jessica J <jessicamclaughlin@eastman.com>  
**Subject:** [I] Chlormequat chloride domestic tolerances coding

Hi, Jessica.

I've been discussing the chlormequat chloride with Jane Eichoff recently and she let me know that you submitted a package last week. I'll look forward to receiving that.

I'll be presenting to the PRIA managers meeting in a couple of weeks to see whether submitting an R292 in addition to the petition for domestic tolerances could be done. I am also planning to check to make sure that the committee agrees with my thoughts on coding the action to add domestic tolerances. Could you let me know what code was included in the application for the new uses submitted last week?

Also, Jane told me that you had recently been on maternity leave. Congratulations! Wishing all the best for you and yours!

-Lindsay

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**Lindsay Roe** - EPA/OCSPP - Office of Pesticide Programs - Registration Division, Fungicide Branch  
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